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MEMO ENDORSED , page 2

June 3, 2022

VIA ECF

Hon. Edgardo Ramos
U.S. District Court for the Southern District of New York
40 Foley Square
New York, New York 10007

Re: Olive Group North America LLC, et al. v. Afghanistan International Bank,
No. 1:21-cv-10836-ER

Dear Judge Ramos:

Defendant Afghanistan International Bank (“Defendant”) and Plaintiffs Olive Group North America LLC, et al. (“Plaintiffs”) write pursuant to Your Honor’s guidance provided during the conference in this matter held on May 19, 2022. During that conference, the Court instructed the parties to meet and confer regarding Plaintiffs’ Motion for Substitution, Plaintiffs’ Pre-Motion Letter Request for permission to file a Motion to Substitute Real Parties in Interest, and Defendant’s request for fees.

The parties met and conferred on June 1, 2022, during which Defendant consented to Plaintiff’s proposed substitution of real parties in interest pursuant to Rule 17 of the Federal Rules of Civil Procedure. Specifically, Defendant consents to the substitution of Olive Group Afghanistan for Olive Group North America LLC, and Integrated Risk Management Company Ltd. for Constellis Integrated Risk Management Services, Inc.

The parties, however, continue to meet and confer regarding Plaintiffs’ proposed substitution of New Constellis Holdings, Inc., under Rule 25 of the Federal Rules of Civil Procedure. Consistent with Your Honor’s instructions, Plaintiffs provided documentation to Defendant related to the proposed substitution, and Defendant has reviewed the materials provided, but Defendant is unable to consent to Plaintiffs’ request based on the information provided by Plaintiffs. Defendant has agreed to provide a list of additional documentation necessary to consider Plaintiffs’ substitution request.

Duane Morris

June 3, 2022
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The parties also discussed Defendant's fee request and have agreed to continue discussions aimed at a non-judicial resolution.

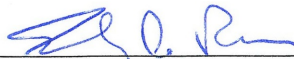
In light of the current status of the parties' discussions, and pursuant to Your Honor's Individual Practice Rule 1(E), Defendant requests that the Court grant a 14-day extension, from June 9, 2022, to June 23, 2022, for Defendant to file a motion for attorneys' fees (if necessary). Should Defendant file a motion for attorneys' fees, the parties request that the associated briefing schedule also be extended 14 days, such that Plaintiffs' response shall be due July 14, 2022, and Defendant's reply shall be due July 22, 2022. Plaintiffs have consented to this extension. This is the first request for an extension of the schedule set by the Court in connection with the anticipated motion.

Respectfully submitted,

/s/ Christopher W. Healy

Christopher W. Healy

The defendant's request for a 14-day extension of the briefing schedule in connection with the defendant's motion for attorneys' fees is GRANTED as follows: moving papers due June 23, 2022; response due July 14, 2022; and reply due July 22, 2022. It is SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: June 6, 2022

New York, New York